97-A54 ERPP

STATE OF CALIFORNIA —THE RESOURCES AGENCY PETE WILSON, *Governor*

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P[illegible]ox 944246
[illegible]AMENTO, CA 94244-2460
(916) 227-2651 FAX (916) 227-2672

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Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

Thank you for the opportunity to comment on the draft Ecosystem Restoration Program Plan (ERPP) for the Bay-Delta ecosystem. The California Department of Forestry and Fire Protection (CDF) acknowledges and supports CALFED's efforts to restore ecosystem processes and habitats for species dependent on the Sacramento-San Joaquin River Delta.

While the ERPP focuses primarily on the immediate Bay-Delta ecosystem, the upper watershed areas that fall under the fire protection and resource management programs of CDF have important connections to the Bay-Delta ecosystem. The upper watershed processes chapter in Volume I identifies these CDF programs as important factors in the management of these watersheds and the protection of water quality and habitat elements important to ERPP goals. However, I am not aware that CALFED has made an effort to engage CDF in discussions regarding how these programs can help meet CALFED goals. Thus, I believe that it is important for stronger linkages to be built between CALFED and CDF to ensure that our mutual concerns can best be met.

General Comments

The ERPP process has placed upper watersheds in Tier 3, the lowest level of priority for project support. In general, this is understandable, given the sheer magnitude of trying to make headway on the millions of acres of upper watersheds that may need attention regarding roads, wildland fire hazards, and forest management practices. However, we believe that there may be a number of compelling upper watershed projects that are readily identifiable, have a clear and significant linkage to the ecosystem restoration goals of the ERPP, and, thus, merit a higher priority for CALFED support.

In this vein, we have identified three critical areas where CDF programs can help to achieve CALFED's Bay-Delta ecosystem restoration goals. First and foremost are watersheds that support streams with native salmonid populations, such as Butte Creek, Mill Creek and Deer Creek. Second, are watersheds that support streams with a high potential for salmonid habitat restoration (particularly downstream of water

supply and flood control impoundments). Clear Creek is a key example of this. Third are watershed areas below reservoirs that are covered with heavy fuel loads of highly hazardous brush or woodland vegetation. CDF programs could potentially target these watersheds with fuels management projects to reduce the risk of catastrophic wildfires and with resource management program efforts to ensure that timber management practices are compatible with ERPP goals. These efforts could result in improvements in water quality and habitat that contribute directly to the CALFED mission of restoring ecosystem processes and habitats for species dependent on the Delta

CDF would like to work with CALFED on upper watersheds to (1) identify pilot projects that strongly support ERPP ecosystem restoration goals, (2) implement these projects and monitor their results, (3) undertake studies to strengthen our understanding of the linkages between upper watershed management and water quality, water quantity, aquatic habitat quality, and other important biophysical parameters, and (4) adjust projects and practices in response to new information. Ideally, this approach would fit within the adaptive management process you are developing for the ERPP. In addition to CDF and CALFED collaboration in this effort, other participants should include relevant counties and the Forest Service.

This approach builds in a complementary fashion on Volume I's approaches to achieving the ERPP fire vision:

- Assist and coordinate restoration efforts with agencies currently responsible for managing the State's shrublands and forests by suppressing wildfires where forest management has allowed fuel levels to become excessive.
- Provide assistance to guide and implement postfire management and habitat recovery strategies to agencies charged with fire management.
- Assist local fire agencies in the Central Valley to provide additional protection to fish and wildlife habitat from catastrophic fires and reduce the risk of fire from wildlife habitats spreading to adjacent lands. (Volume I, p. 282)

The ERPP vision summary for wildfire is to "support programs that will reduce the acreage and frequency of catastrophic wildfires and the consequences of wildfires," (Volume I, Table I, p. 14). CDF programs can contribute to the achievement of this vision in a number of ways. Perhaps the most obvious is our fire suppression program, which aims to extinguish all wildfires on state responsibility lands in as rapid and as environmentally sensitive manner as is feasible. Detailed fire suppression protocols can be developed for areas with specific water quality and habitat protection concerns. For example, the Metropolitan Water District developed a fire suppression plan for the

Lake Matthews reservoir in Riverside County. This plan has been very successful at protecting both water quality and habitat concerns.

CDF develops and implements fuels reduction projects under two of its programs, the Vegetation Management Program and the California Fire Plan. Both of these programs have significant environmental improvement underpinnings. Further, CDF has recently been working with the California Native Plant Society and The Nature Conservancy to strengthen the ecosystem health component of the California Fire Plan assessment process. By identifying hazardous fuels problems and addressing them through mechanical fuels reduction and prescribed fire, these programs can significantly reduce the risk of catastrophic fires and their threats to water quality and to riparian habitats of concern to CALFED.

CDF programs also significantly shape the forest management practices applied on upper watersheds, through both assistance and regulatory mechanisms. Forest management practices—such as road building, timber harvesting, and forest health improvement—can significantly affect watershed processes important to the achievement of ERPP goals. The Board of Forestry's watercourse protection rules provide a high level of protection to riparian habitat, stream health, and water quality. In the course of our Forest Practice Program monitoring efforts, we have found a high degree of compliance with our watercourse protection standards. Our monitoring also indicates that there may be some problems with compliance with regulations for minimizing or avoiding erosion and soil movement related to roads. The department and the Board of Forestry are following this issue closely and will take appropriate actions to address any identified shortcomings in standards or their implementation.

The foregoing discussion demonstrates that CDF programs can make significant, direct contributions toward the achievement of the objectives, targets, and programmatic actions identified the upper watersheds chapter of Volume I. Realistically, however, financial support from CALFED—for example, through the Category III funding process—will be needed for CDF to expand its fuels management programs to address upper watershed processes with direct linkages to ERPP Delta ecosystem restoration goals.

Despite the huge magnitude of resources being invested in the CALFED process and ERPP implementation, the scale of the problems you are addressing means that these resources must be carefully targeted to achieve the greatest restoration of ecosystem processes and habitats for species dependent on the Sacramento-San Joaquin River Delta. I believe that CDF and CALFED can successfully collaborate in our areas of programmatic overlap to identify critical upper watersheds and implement key water quality and habitat enhancement projects that will provide very significant ecosystem results for the Delta.

Specific Comments

The Vision Summary that Volume I, Table 1, provides for upper watershed processes expresses a desire to reduce the level of "excessive" timber harvesting. The Volume I document, including the chapter on upper watershed processes, provides no indication as to what is meant by "excessive" timber harvest. Is this a reference to volumes of timber harvested, amount of environmental disturbance associated with harvest (e.g., soil erosion, removal of stream shading, etc.), or some other factor? In order to avoid a potential misunderstanding or unintended politicization of timber harvest through vagueness of terms, I hope that you will be able to clarify what the ERPP document means by "excessive" timber harvest.

We are concerned that Table 13 shows that no implementation objectives, targets, or programmatic actions have been established to reduce wildfire stressors in any of the 14 ecological zones. This seems contrary to the text of the upper watersheds chapter, as well as the detailed discussion of objectives, targets, and actions presented in Volume II for each of the ecological zones.

Volume I indicates that the ERPP proposes to "manage and use fire as a tool to restore and maintain native habitats." CDF has had some initial discussions with the Department of Fish and Game, The Nature Conservancy, and the California Native Plant Society regarding how we might start to approach this and similar ecosystem health issues through the implementation of the California Fire Plan. The hoped-for fruits of these discussions could be of use to implementation of the ERPP.

As the result of our many years of experience with geographic information systems (GIS) and of data we are developing for implementation of the California Fire Plan, we have the ability to help identify key watershed areas for the reduction of hazardous fuel loadings that threaten the ecosystem restoration goals of the ERPP. Our Fire and Resource Assessment Program will soon deliver to you a map of the wildland fire history on the watersheds of Mill and Deer Creeks. At a later date, we will deliver wildland fire fuel hazard maps for a number of the key watersheds for the ERPP process.

Conclusion

The ERPP process creates a number of important areas for collaboration between CALFED and CDF. I believe that our collaboration in these areas will benefit

dialogue on how we might collaborate, please contact me at the above number, or contact Dr. William Stewart, chief of our Fire and Resource Assessment Program at (916) 227-2650.

Sincerely,

Richard A. Wilson
Director

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Enclosure